

EX. 12

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

DARCY M. BLACK,

Plaintiff,

-vs-

BUFFALO MEAT SERVICE, INC., doing business
as BOULEVARD BLACK ANGUS, also known as
BLACK ANGUS MEATS, also known as
BLACK ANGUS MEATS & SEAFOOD,
ROBERT SEIBERT,
DIANE SEIBERT,
KEEGAN ROBERTS,

Defendants.

Examination Before Trial of

PATRICK HOWELLS, taken pursuant to the Federal Rules of
Civil Procedure, in the law offices of GRECO TRAPP, PLLC,
1700 Rand Building, 14 Lafayette Square, Buffalo, New York,
taken on February 19, 2018, commencing at 9:26 A.M., before
MARY ANN MORETTA, Notary Public.

1 Q. Did you go to my client's wedding?

2 A. Yes.

3 Q. Are you personal friends of hers?

4 A. I wouldn't say personal friends, no.

5 Q. Did you ever do anything with her outside of
6 work, other than go to her wedding?

7 A. No.

8 Q. Strike that. Did you ever do anything with her
9 outside of Black Angus Meat, other than go to her
10 wedding?

11 A. No.

12 MS. BAHAS: Objection. Form.

13 BY MS. GRECO:

14 Q. Did you get an invitation to her wedding?

15 A. I don't recall.

16 Q. Did you ever go to a wedding you didn't get an
17 invitation to?

18 A. Yes.

19 Q. Whose wedding did you go to that you didn't get
20 an invitation to?

21 A. I was like a date, so --

22 Q. Okay. Were you a date at Darcy Black's wedding?

23 A. Not with Darcy, no.

1 Q. So I asked did you ever go to a wedding where you
2 were the person that was being invited without an
3 invitation?

4 MS. BAHAS: Objection. Form.

5 BY MS. GRECO:

6 Q. You can answer.

7 A. I believe the way I was invited to Darcy's
8 wedding, my dad said Darcy wanted you to come to
9 the wedding. I can't recall getting an
10 invitation.

11 Q. Do you recall Darcy Black handing you an
12 invitation face to face?

13 A. No.

14 Q. Do you know how Darcy Black handed out the
15 invitations for her wedding?

16 A. No.

17 Q. Do you know if she invited all the individuals
18 who worked with her at Black Angus Meat?

19 A. No.

20 Q. Did you go to the wedding?

21 A. Yes.

22 Q. Who did you go with?

23 A. Myself, my brother and my father.

1 Q. Who did you drive with?

2 A. I don't recall how I got there.

3 Q. Okay. And is there anything that would refresh
4 your recollection as to how you were invited to
5 Darcy Black's wedding?

6 A. No.

7 Q. On how many occasions had you met her before you
8 were invited to her wedding?

9 A. I don't know.

10 Q. Give me your best estimate.

11 A. More than once, less than ten.

12 Q. Okay. Have you ever gone to the wedding of
13 someone where you were the person invited, where
14 you have met them less than ten times?

15 MS. BAHAS: Objection to form.

16 BY MS. GRECO:

17 Q. You can answer.

18 A. I don't recall.

19 Q. Do you know how many individuals were employed at
20 Black Angus Meat during the time that you've been
21 going there?

22 A. No.

23 Q. Did you ever help setting up the pack room?